



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
841 Chestnut Building  
Philadelphia, Pennsylvania 19107

130285

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

DEC 16 1991

Louis Minella, Esquire  
Rollins Environmental Services Delaware, Inc.  
1 Rollins Plaza  
2200 Concord Pike  
Wilmington, DE 19803

Re: Publicker Industries/Cuyahoga Wrecking Site, Philadelphia  
County, Philadelphia, Pennsylvania

Dear Mr. Minella:

This letter is to obtain certain information from Rollins Environmental Services Delaware, Inc. (Rollins) in connection with the Publicker Industries/Cuyahoga Wrecking Site located in Philadelphia, Pennsylvania.

The U.S. Environmental Protection Agency (EPA) is currently investigating the source, extent and nature of the release or threatened release of hazardous substances, pollutants or contaminants into the environment at the Publicker Industries/Cuyahoga Wrecking Site. The Site is located in the southeast portion of the City of Philadelphia, Pennsylvania. It is bordered to the east by the Delaware River, to the north by the Ashland Chemical Company, to the south by the Packer Marine Terminal and New Orleans Cold Storage and to the west by Delaware Avenue. This investigation involves, among other things, an inquiry into the past and present ownership of the Site and operators of the Site. EPA additionally is seeking to obtain information concerning the generation, storage, treatment, transportation, and disposal methods of such substances that have been or threaten to be released from the Site. EPA believes that you may possess information which may assist the Agency in its investigation of the Site.

On October 23, 1991, three (3) yellow salvage drums were discovered along the south side of the Site just north of Packer Avenue. Two of the drums were found on their sides and an undetermined amount of their contents had leaked onto a concrete pad. Markings on two of the drums identify the United States Department of Energy (DOE) Savannah River Plant (DOE Plant) located in Aiken, South Carolina as the drums' place of origin. The markings also indicate that one drum (drum A) was among those drums transported from the DOE Plant under New Jersey State Manifest #NJA 0307185 and the other drum (drum B) was among those drums

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transported from the DOE Plant under New Jersey State Manifest #NJA 0307192. The third drum (drum C) was marked but the label was painted over and illegible. Drums A and B also contained information concerning, among other things, the contents of the drums.

Through telephone conversations with representatives of the DOE Plant EPA learned that Rollins was hired by the DOE Plant to transport and dispose of the original contents of drums A and B. The DOE Plant has provided EPA with copies of the state manifests, Certificates of Destruction and invoices concerning the disposal of the contents of drums A and B by Rollins (Attachment A).

In order to complete this investigation, EPA requires that Rollins respond fully and completely to the items attached hereto as Attachment B.

Authority to require submission of this type of information has been given to EPA by Congress under Section 104(e) of the Comprehensive Environmental Response, Compensation and Liability Act of 1980, as amended (CERCLA), 42 U.S.C. Section 9604(e), and under Section 3007(a) of the Resource Conservation and Recovery Act, as amended (RCRA), 42 U.S.C. Section 6927(a). EPA requires that you respond in writing to this required submission of information, to the address specified below, within fifteen (15) calendar days of your receipt of this letter.

The provisions in Section 104 of CERCLA, 42 U.S.C. Section 9604 and Section 3008 of RCRA, 42 U.S.C. Section 6928, authorize EPA to pursue penalties for failure to comply with these provisions or failure to respond adequately to required submissions of information. In addition, providing false, fictitious or fraudulent statements or representations may subject you to criminal penalties under 18 U.S.C. Section 1001. The information you provide may be used by EPA in administrative, civil, or criminal proceedings.

As used in this letter, the term "documents" means: writings (handwritten, typed or otherwise produced or reproduced) and includes, but is not limited to, any invoices, checks, receipts, bills of lading, weight receipts, toll receipts, correspondence, offers, contracts, agreements, deeds, leases, manifests, licenses, permits, bids, proposals, policies of insurance, logs, books of original entry, minutes of meetings, memoranda, notes, calendar or daily entries, agendas, bulletins, notices, announcements, charts, maps, photographs, drawings, manuals, brochures, reports of scientific study or investigation, schedules, price lists, telegrams, teletypes, phono-records, magnetic voice or video records, tapes, summaries, magnetic tapes, punch cards, recordings, discs, computer printouts, or other data compilations from which information can be obtained or translated.

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You are entitled to assert a claim of business confidentiality covering all or any part of the submitted information, in the manner described in 40 C.F.R. Section 2.203(b). Information subject to a claim of business confidentiality will be made available to the public only in accordance with the procedures set forth in 40 C.F.R. Part 2, Subpart B. If a claim of business confidentiality is not asserted at the time the required information is submitted to EPA, EPA may make this information available to the public without further notice to you.

This required submission of information is not subject to the approval requirements under the Paperwork Reduction Act of 1980, 44 U.S.C. Section 3501 et seq.

We appreciate and look forward to your prompt response to this letter. EPA is convinced that appropriate investigation and clean-up of hazardous sites can be accomplished only through full participation of interested citizens, and we note your contribution to this effort through your response to this letter.

All documents, information and any questions you may have regarding the current status of this Site in the Superfund process should be directed to:

Frances Costanzi (3HW22)  
U.S. Environmental Protection Agency  
Region III  
841 Chestnut Building  
Philadelphia, Pennsylvania 19107

If you have any questions concerning this matter, please contact Ms. Costanzi at (215) 597-3923.

Very truly yours,

*Peter W. Schaul*  
Peter W. Schaul, Chief  
Superfund Remedial Branch

Enclosure

cc: Frances Costanzi (3HW22)  
Brian M. Nishitani, Esq. (3RC31)  
Joseph M. McCabe (3RC32)

AR200237

ATTACHMENT A

PUBLICKER INDUSTRIES/CUYAHOGA WRECKING SITE

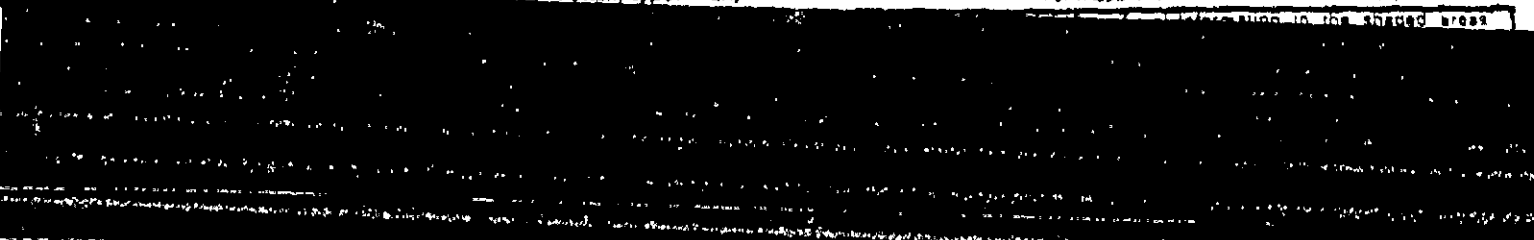
AR200238

A"

State of New Jersey  
Department of Environmental Protection  
Division of Waste Management  
CN 026, Trenton, NJ 08626

(Form designed for use on elite (12-pitch) typewriter.)

Form Approved OMB No. 2050-0039, Expires 9-30-88



7. Transporter 2 Company Name		8. US EPA ID Number		9. Transporter's Phone	
10. Designated Facility Name and Site Address <b>ROLLINS ENVIRONMENTAL SERVICES (NJ) INC. RT. 322 &amp; I-295 BRIDGEPORT, NJ 08014</b>		11. US EPA ID Number <b>NJ D 0 5 3 2 8 8 2 3 9</b>		12. State Facility's ID <b>609-467-3100</b>	
13. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		14. Containers No. Type		15. Total Quantity Unit: WT/VOL	
16. <b>RQ WASTE FLAMMABLE LIQUID, N.O.S., FLAMMABLE LIQUID, UN1993 (EPA IGNITABILITY) (D001)</b>		17. <b>6 0 D M 3 0 5 0 0 P</b>		18. <b>EST: D001</b>	
19. Additional Descriptions for Materials Listed Above		20. Handling Codes for Wastes Listed Above		21. Waste No.	
22. <b>a) CONTAINS SPENT PAINT SOLVENTS, F003, F005, D008</b>		23. <b>T03</b>		24. <b>BLDG. 703-A</b>	
25. Special Handling Instructions and Additional Information <b>IF UNDELIVERABLE, RETURN TO GENERATOR. RETURN MANIFEST TO A.V. GUANLAO (ADDRESS ABOVE) FC CHEMICAL SPILL, CONTACT CHEMTREC 1-800-424-9300 (PROTECTIVE CLOTHING REQUIRED WHEN REF: L-10602, BILL OF LADING# 97966 PLACARDS PROVIDED HANDLING)</b>					
26. GENERATOR'S CERTIFICATION. I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.  If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment. OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.					
27. Printed/Typed Name <b>VICKIE B. Wheeler</b> <b>ON BEHALF OF U.S. DOE, SRP</b>		28. Signature <i>Vickie B. Wheeler</i>		29. Month Day Year <b>11/11/88</b>	
30. 17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name <b>David Schaeffer</b>		31. Signature <i>David Schaeffer</i>		32. Month Day Year <b>11/11/88</b>	
33. 18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name		34. Signature		35. Month Day Year	
36. 19. Discrepancy Indication Space <b>Item J; L, I</b> <b>AR200239 (28980 lbs)</b> <i>on</i>					
37. 20. Facility Owner or Operator. Certification of receipt of hazardous materials covered by this manifest except as noted in item 19 Printed/Typed Name <b>Mark New</b>					
38. Signature <i>Mark New</i>		39. AR200239		40. Month Day Year <b>11/11/88</b>	

SIGNATURE AND INFORMATION MUST BE LEGIBLE ON ALL COPIES

## HAZARDOUS WASTE OFFSITE SHIPMENT

## APPROVAL SHEET

All offsite shipments of hazardous waste from SRP for recycle treatment or disposal will be conducted in accordance with all applicable regulatory requirements and must be approved by Environment and Energy/Waste Management - Environmental, Site Quality (RHYTHM) - Transportation, and Health Protection - Radioactivity Clearance.

A. EPA/SCDHEC Regulatory Requirements Initial When Completed

1. Hazardous Waste Characterization Completed YBU
2. SRP Waste Stream ID: W03-001
3. EPA ID No. of Transporter and Disposal Facility  
 Generator: SRP, Aiken, SC EPA ID: SC 1890008989  
 Transporter: SYS TRANSPORTATION NJD071629976  
 Disposer: Rollins Environmental Services (NS), INC NTD00323239
4. Vice President Approval Date: 1/20/87
5. Departmental Approval:  
 Name: M.V. Gaudin E&E Dept. ☒ Date: 11/12/87  
 Name: J.B. Whitley WM Dept. WMO Date: 11/12/87

B. Department of Transportation Requirements Manifest # NJA 0907185

1. Shipping Papers (Manifest, Bill of Lading, Etc.) YBU (Partial)
2. Proper Shipping Name: RG Waste Flammable Liquid, n.o.s.,  
Flammable Liquid UN 1993 (EPA Ignitability)  
Manifest # NJA 0307185
3. Vehicle Placards, Containers Labels and Markings ☒
4. Container(s) inspected prior to shipment  
 Inspected by: M. Sullivan Date: 11-12-87
5. Departmental Approval:  
 Name: Wickens SQ Dept. ☒ Date: 11-12-87

C. Health Protection Clearance

1. Container/Shipment checked for radioactivity YES
2. Waste cleared for shipment YES
3. Departmental Approval:  
 Name: G.M. Covert (JH) HP Dept. B-G Date: 12 Nov 87

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AR200240



E. I. DU PONT DE NEMOURS & COMPANY

(INCORPORATED)

ATOMIC ENERGY DIVISION

SAVANNAH RIVER PLANT

AKEN, SOUTH CAROLINA 29808-0001

(TWX 810-771-2670 TEL 803-725-4211 WU AUGUSTA GA)

November 12, 1987

Kathryn I. Marino

Rollins Environmental Services, Inc.

Route 322 and Interstate 95

Bridgeport, New Jersey 08014

GENERATOR NOTIFICATION OF RESTRICTED  
WASTE TREATMENT AND DISPOSAL, 40 CFR 268.7

The U. S. Department of Energy, Savannah River Plant, EPA ID No. SC 1890008989, hereby notifies Rollins Environmental Services, Inc., EPA ID No. NJD 053288239 of a shipment of restricted hazardous waste in accordance with EPA regulations on land disposal restrictions (40 CFR 268.7). In conjunction with this notification, the following information is being provided:

- A. EPA Hazardous Waste Number: Spent non-halogenated solvent waste (paint solvents containing F003 and F005).
- B. Treatment Standards: The waste cannot be disposed in landfills without treatment because the waste extract is expected to exceed the 40 CFR 268.41 standards (Table 1), based on knowledge of the waste and waste analysis (see Item D below). The waste must be incinerated to achieve 0.15 mg/L Xylene, the lowest treatment standard for the constituents of concern and the treatment residue extract be evaluated by Rollins Environmental Services for proper disposal.
- C. Waste Manifest Document Number: NJA 0307185
- D. Waste Analysis Data: The waste analysis (and knowledge of the waste) and completed waste characterization forms (Du Pont Code WCS-001, 9/19/86) have been previously provided to Rollins Environmental Services, Inc.

On behalf of: Walter B. Wheeler  
U. S. Department of Energy, Savannah River Plant

0279G

AR200241

TABLE 1

CONSTITUENT CONCENTRATIONS WASTE EXTRACT

<u>SPENT SOLVENTS</u>	<u>CONCENTRATIONS, mg/L</u>
Methyl ethyl ketone	0.75
Methyl isobutyl ketone	0.33
Toluene	0.33
Xylene	0.15

AR200242



**State of New Jersey  
Department of Environmental Protection  
Division of Waste Management  
CN 028, Trenton, NJ 08625**

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved OMB No 2050-0039 Expires 9-30-88

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator's US EPA ID No. S C 1 8 9 0 0 0 8 9 8 9 1 1 A		Manifest Document No. 1 1 A		2. Page 1 of 1		Information in the shaded areas is not required by Federal law									
3. Generator's Name and Address U.S. DEPARTMENT OF ENERGY (DOE) SAVANNAH RIVER PLANT, PO BOX A AIKEN, SC 29808						A. State Manifest Document Number <b>NJA 0307192</b>											
4. Generator's Phone (803) 557-8767 or (803) 557-4451						B. State Generator's ID SAME											
5. Transporter 1 Company Name Rollins Environmental Services, Inc.						C. State Transporter's ID NJ 0307192-24942											
6. Transporter 1 US EPA ID Number NJ D 0 5 3 2 8 8 2 3 9						D. Transporter's Phone (609) 467-3100											
7. Transporter 2 Company Name						E. State Transporter's ID											
8. Transporter 2 US EPA ID Number						F. Transporter's Phone											
9. Designated Facility Name and Site Address ROLLINS ENVIRONMENTAL SERVICES (NJ), INC. RT. 322 & I295 BRIDGEPORT, NJ 08014						G. State Facility's ID NJ 0307192-24942											
10. US EPA ID Number NJ D 0 5 3 2 8 8 2 3 9						H. Facility's Phone (609) 467-3100											
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)						12. Containers No. Type		13. Total Quantity		14. Unit Wt/Vol		15. Waste No.					
a. EQ WASTE FLAMMABLE LIQUID, N.O.S., FLAMMABLE LIQUID, UN1993 (EPA IGNITABILITY)						38 DM		17100 (EST.)		P		D001					
b.																	
c.																	
d.																	
J. Additional Descriptions for Materials Listed Above a) CONTAINS SPENT PAINT SOLVENTS, F003, F005, D008						K. Handling Codes for Wastes Listed Above T03											
16. Special Handling Instructions and Additional Information IF UNDELIVERABLE, RETURN TO GENERATOR. FOR CHEMICAL SPILL, CONTACT CHEMTREC 1-800-424-9300 REF: L-10602 BILL OF LADING #97970 PLACARDS PROVIDED										RETURN MANIFEST TO A.V. GUANLAO 703-A, (ADDRESS ABOVE). (PROTECTIVE CLOTHING REQUIRED WHEN HANDLING)							
17. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment. OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.																	
Printed/Typed Name VICKIE B. WHEELER						Signature Vickie B. Wheeler				Month Day Year 11/12/87							
ON BEHALF OF U.S. DOE, SRP																	
17. Transporter 1 Acknowledgement of Receipt of Materials						Printed/Typed Name VICKIE B. WHEELER				Signature				Month Day Year			
18. Transporter 2 Acknowledgement of Receipt of Materials						Printed/Typed Name Mickey Hogley				Signature Mickey Hogley				Month Day Year 11/12/87			
19. Discrepancy Indication Space IN J: L, I AR200243																	
20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.																	
Printed/Typed Name T. C. P. F. MURPHY						Signature T. C. P. F. MURPHY				Month Day Year 11/12/87							

# HAZARDOUS WASTE OFFSITE SHIPMENT

## APPROVAL SHEET

All offsite shipments of hazardous waste from SRP for recycle treatment or disposal will be conducted in accordance with all applicable regulatory requirements and must be approved by Environment and Energy/Waste Management - Environmental, Site Quality (RHYTHM) - Transportation, and Health Protection - Radioactivity Clearance.

### A. EPA/SCDHEC Regulatory Requirements Initial When Completed

1. Hazardous Waste Characterization Completed UBW
2. SRP Waste Stream ID: WCS-COI
3. EPA ID No. of Transporter and Disposal Facility  
Generator: SRP, Aiken, SC EPA ID: SC 1890008989  
Transporter: Rollins Environmental NJD053288239  
Disposer: Rollins Environmental Services (NS) NJD053288239
4. Vice President Approval Date: 11/20/87
5. Departmental Approval:  
Name: B. V. Gumbel E&E Dept. ☒ Date: 11/24/87  
Name: J. B. Whelan WM Dept. UNO Date: 11/24/87

### B. Department of Transportation Requirements

1. Shipping Papers (Manifest, Bill of Lading, Etc.) UBW
2. Proper Shipping Name: RC Waste Flammable Liquid, n.o.s.,  
Flammable Liquid UN1993 (EPA Ignitability)  
Manifest # 0387192
3. Vehicle Placards, Containers Labels and Markings
4. Container(s) inspected prior to shipment  
Inspected by: M. Sullivan Date: 11-24-87
5. Departmental Approval:  
Name: W. J. Carr, 11-24-87 SQ Dept. ☒ Date: 11/24-87

### C. Health Protection Clearance

1. Container/Shipment checked for radioactivity yes
2. Waste cleared for shipment yes
3. Departmental Approval:  
Name: Enclup/R. Taylor HP Dept. 643-G Date: 11-24-87

0280G

AR200244



E. I. DU PONT DE NEMOURS & COMPANY

INCORPORATED

ATOMIC ENERGY DIVISION

SAVANNAH RIVER PLANT

AIKEN, SOUTH CAROLINA 29808-0001

(TWX 810-771-2670, TEL 803-723-8211, WU: AUGUSTA GA)

November 24, 1987

Kathryn I. MARINO

Rollins Environmental Services, Inc.  
Route 322 and Interstate 95  
Bridgeport, New Jersey 08014

GENERATOR NOTIFICATION OF RESTRICTED  
WASTE TREATMENT AND DISPOSAL, 40 CFR 268.7

The U. S. Department of Energy, Savannah River Plant, EPA ID No. SC 1890008989, hereby notifies Rollins Environmental Services, Inc., EPA ID No. NJD 053288239 of a shipment of restricted hazardous waste in accordance with EPA regulations on land disposal restrictions (40 CFR 268.7). In conjunction with this notification, the following information is being provided:

- A. EPA Hazardous Waste Number: Spent non-halogenated solvent waste (paint solvents containing F003 and F005).
- B. Treatment Standards: The waste cannot be disposed in landfills without treatment because the waste extract is expected to exceed the 40 CFR 268.41 standards (Table 1), based on knowledge of the waste and waste analysis (see Item D below). The waste must be incinerated to achieve 0.15 mg/L Xylene, the lowest treatment standard for the constituents of concern and the treatment residue extract be evaluated by Rollins Environmental Services for proper disposal.
- C. Waste Manifest Document Number: NJA0307192
- D. Waste Analysis Data: The waste analysis (and knowledge of the waste) and completed waste characterization forms (Du Pont Code WCS-001, 9/19/86) have been previously provided to Rollins Environmental Services, Inc.

On behalf of: Victor B. Wessels  
U. S. Department of Energy, Savannah River Plant

0279G

AR200245

TABLE 1

CONSTITUENT CONCENTRATIONS WASTE EXTRACT

<u>SPENT SOLVENTS</u>	<u>CONCENTRATIONS. mg/L</u>
Methyl ethyl ketone	0.75
Methyl isobutyl ketone	0.33
Toluene	0.33
Xylene	0.15

AR200246



Rollins

February 9, 1988

Mr. Donald J. Zecha  
E. I. DuPont de Nemours & Co., Inc.  
Savannah River Plant  
Building 703-H  
Aiken, South Carolina 29808

Subject: CERTIFICATE OF INCINERATION; L-10602; "SPENT PAINT SOLVENT WASTE"

Dear Mr. Zecha:

Please be advised that for the period beginning October 21, 1987 through December 31, 1987, Rollins Environmental Services (NJ) Inc., destroyed the following material via high temperature incineration at the Bridgeport, NJ facility:

Bill of Lading Number	Pick Up Date	Pounds	Number of Drums
77210 ASAC0307197	10/19/87	28,860	60 Steel Drums
77211 ASAC0307198	10/19/87	28,290	60 Steel Drums
77255 ASAC0307199	10/26/87	27,690	60 Steel Drums
77256 ASAC0307190	10/26/87	27,210	60 Steel Drums
77417 ASAC0307191	11/10/87	30,590	60 Steel Drums
77418 ASAC0307197	11/10/87	28,920	60 Steel Drums
"A" → 77485 ASAC0307195	11/12/87	28,980	60 Steel Drums
77531 ASAC0307186	11/16/87	31,510	60 Steel Drums
"B" → 77532 ASAC0307048	11/16/87	28,670	60 Steel Drums
77667 ASAC0307192	11/23/87	14,570	38 Steel Drums

If you need any additional information, please do not hesitate to contact your Rollins Sales Representative.

77666 LAWM113	11/23/87		60
77667 LAWM112	11/23/87	Sincerely,	60
77587 LAWM111	11/17/87		60
77537 LAWM107	11/12/87		60
77536 LAWM110	11/18/87	Donald J. Frost Technical Manager	60

cc: R. S. Sernyak, RES, Inc., Bellevue Corporate Center  
T. L. Hamberger, Purchasing Agent, DuPont, Wilm., DE

/kim

AR200247



ROLLINS ENVIRONMENTAL SERVICES (NJ) INC.

RT 322 & I-295  
BRIDGEPORT  
609-467-3100

NJ 08014

INVOICE

NO 731540  
CUST NO 01410  
DATE 11/30/87  
PAGE 1INVOICE  
TOE.I. DUPONT & CO.  
SAVANNAH RIVER FLANTAIKEN SC 29801  
ATT: ACCOUNTS PAYABLERECEIVED  
FROM

CUSTOMER REFERENCE

AX-781454

STREAM NO. &amp; DESCRIPTION

L 10602

CARRIER REFERENCE

RES

SPENT PAINT SOLVENT WASTE

165760

ITEM NO.	B/L NO. B/L DATE MEST NO.	PRICE CODE	DESCRIPTION	QUANTITY	UM	UNIT PRICE	AMOUNT
1	77667 11/23/87 NJA0307192	1121 3101 3153 9001  9999	INCINERATION-DRUM TRANS 40K MIN DELAY CHARGE N.J. HAZ WASTE SCHG  TOTAL	38.00 400.00 2.50 .00	D85 CWT HRS	250.0000 5.6500 50.0000 .0500	9,500.0 2,260.0 125.0 475.0  12,360.0

FOR SERVICES RENDERED  
*D. J. Brooks*  
EDITH BROOKS  
102-A RM 191

DATE

12/1/87

TERMS: NET DUE UPON RECEIPT OF INVOICE.

A SERVICE CHARGE OF 1.50% PER MONTH WILL BE CHARGED ON PAST DUE AMOUNTS.

INQUIRIES: PLEASE PHONE DOTTIE HARRISON AT 609-467-3100 WITH ANY QUESTI

REMIT TO: P.O. BOX 96147

CHICAGO

IL 60693



## ROLLINS ENVIRONMENTAL SERVICES (NJ) INC.

RT 322 & I-295  
BRIDGEPORT  
809-487-3100

NJ 08014

## INVOICE

NO 731352  
CUST NO 01410  
DATE 11/17/87  
PAGE 1E.I. DUPONT & CO.  
SAVANNAH RIVER PLANTNIKEN SC 29501  
ATT: ACCOUNTS PAYABLERECEIVED  
FROM

## CUSTOMER REFERENCE

AX-751454

## STREAM NO. &amp; DESCRIPTION

L 10602

SPENT PAINT SOLVENT WASTE

## CARRIER REFERENCE

S-J

164672

ITEM NO.	B/L NO. B/L DATE MEST NO.	PRICE CODE	DESCRIPTION	QUANTITY	UM	UNIT PRICE	AMOUNT
1	77435 11/12/87 NJAO307153	1121 3101 5001	INCINERATION-DRUM TRANS 40K MIN N.J. HAZ WASTE SCHG	60.00 400.00 .00	DRG CWT	250.0000 5.6500 .0500	15.000. 2.260. 750.
		9999	TOTAL				18.010.

FOR SERVICES RENDERED

DATE

*Donald A. Zerk*  
AFTER SIGNATURE RETURN TO:  
EDITH R. BROOKS  
742-A RM. 191

12/7/87

TERMS: NET DUE UPON RECEIPT OF INVOICE.

A SERVICE CHARGE OF 1.50% PER MONTH WILL BE CHARGED ON PAST DUE AMOUNTS.  
INQUIRIES. PLEASE PHONE DOTTIE HARRISON AT 809-487-3100 WITH ANY QUEST.

REMIT TO: P.O. BOX 96147

CHICAGO

IL 60693

AR200249

ATTACHMENT B

PUBLICKER INDUSTRIES/CUYAHOGA WRECKING SITE

FIRST INFORMATION REQUEST

Instructions

1. Please provide a separate narrative response to each and every Question and subpart of a Question set forth in this Information Request.

2. Precede each answer with the number of the Question to which it corresponds.

3. If information or documents not known or not available to you as of the date of submission of a response to this Information Request should later become known or available to you, you must supplement your response to EPA. Moreover, should you find, at any time after the submission of your response that any portion of the submitted information is false or misrepresents the truth, you must notify EPA of this fact as soon as possible and provide EPA with a corrected response.

4. For each document produced in response to this Information Request indicate on the document, or in some other reasonable manner, the number of the Question to which it responds.

5. The information requested herein must be provided even though the Respondent may contend that it includes possibly confidential information or trade secrets. You may, if you desire, assert a confidentiality claim covering part or all of the information requested, pursuant to Sections 104(e)(7)(E) and (F) of CERCLA, as amended by SARA, 42 U.S.C. §§ 9604(e)(7)(E) and (F), Section 3007(b) of RCRA, 42 U.S.C. § 6927(b), and 40 C.F.R. § 2.203(b), by attaching to such information at the time it is submitted, a cover sheet, stamped or typed legend, or other suitable form of notice employing language such as "trade secret," or "proprietary" or "company confidential." Information covered by such a claim will be disclosed by EPA only to the extent, and only by means of the procedures set forth in statutes and regulation set forth above. If no such claim accompanies the information when it is received by EPA, it may be made available to the public by EPA without further notice to you. You should read the above-cited regulations carefully before asserting a business confidentiality claim, since certain categories of information are not properly the subject of such a claim.

AR200250



### Definitions

The following definitions shall apply to the following words as they appear in this Attachment B:

1. The term "you" or "Respondent" shall mean the addressee of this Request, Rollins Environmental Services Delaware, Inc., the addressee's officers, managers, employees, contractors, trustees, partners, successors, assigns, and agents.

2. The term "person" shall have the same definition as in Section 101(21) of CERCLA, 42 U.S.C. § 9601(21): "an individual, firm, corporation, association, partnership, consortium, joint venture, commercial entity, United States Government, State, municipality, commission, political subdivision of a State, or any interstate body."

3. The terms "the Site" or "the facility" shall mean and include the property on or about the Cuyahoga Wrecking/Overland Corporation property that is bounded by the Delaware River to the east, the Ashland Chemical Company to the north, both the Packer Marine Terminal and New Orleans Cold Storage facility to the south and Delaware Avenue to the west in Philadelphia, Pennsylvania, and also known as the Publicker Industries/Cuyahoga Wrecking Site.

4. The term "hazardous substance" shall have the same definition as that contained in Section 101(14) of CERCLA, 42 U.S.C. § 9601(14), and includes any mixtures of such hazardous substances with any other substances, including petroleum products.

5. The term "pollutant or contaminant," shall have the same definition as that contained in Section 101(33) of CERCLA, 42 U.S.C. § 9601(33), and includes any mixtures of such pollutants and contaminants with any other substances. Petroleum products mixed with pollutants and contaminants are also included in this definition.

6. The term "hazardous waste" shall have the same definition as that contained in Section 1004(5) of RCRA, 42 U.S.C. § 6903(5).

7. The term "solid waste" shall have the same definition as that contained in Section 1004(27) of RCRA, 42 U.S.C. § 6903(27).

8. The term "materials" shall mean all substances that have been generated, treated, stored, or disposed of or otherwise handled at or transported to the Site, including but not limited to all hazardous substances, pollutants and contaminants, hazardous wastes and solid wastes, as defined above and such non-hazardous substances as, but not limited to, fuel oil, ethylene glycol, denatured alcohols and potable spirits.

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9. The term "hazardous material" shall mean all hazardous substances, pollutants or contaminants, and hazardous wastes, as defined above.

10. The term "non-hazardous material" shall mean all material as defined above, excluding hazardous substances, pollutants and contaminants, and hazardous waste.

11. The term "identify" means, with respect to a natural person, to set forth the person's name, present or last known business address and business telephone number, present or last known home address and home telephone number, and present or last known job title, position or business.

12. The term "identify" means, with respect to a corporation, partnership, business trust or other association or business entity (including a sole proprietorship) to set forth its full name, address, legal form (e.g. corporation, partnership, etc.), organization, if any, and a brief description of its business.

13. The term "identify" means, with respect to a document, to provide its customary business description, its date, its number if any (invoice or purchase order number), the identity of the author, addressor, addressee and/or recipient, and the substance or the subject matter.

14. The term "release" has the same definition as that contained in Section 101(22) of CERCLA, 42 U.S.C. § 9601(22), and includes any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, including the abandonment or discharging of barrels, containers, and other closed receptacles containing any hazardous substance or pollutant or contaminant.

15. The terms "document" and "documents" shall mean any object that records, stores, or presents information, and includes writings of any kind, formal or informal, whether or not wholly or partially in handwriting, including by way of illustration and not by way of limitation, any invoice, manifest, bill of lading, receipt, endorsement, check, bank draft, canceled check, deposit slip, withdrawal slip, correspondence, record book, minutes, memorandum of telephone and other conversations including meetings, agreements and the like, diary, calendar, desk pad, scrapbook, notebook, bulletin, circular, form, pamphlet, statement, journal, postcard, letter, telegram, telex, report, notice, message, analysis, comparison, graph, chart, interoffice or intraoffice communications, photostat or other copy of any documents, microfilm or other film record, any photograph, sound recording on any type of device, any punch card, disc or disc pack; any tape or other type of memory generally associated with computers and data processing (together with the programming instructions and other written material necessary to use such punch card, disc, or disc pack, tape or other type of memory and together with printouts of such punch card, disc, or disc pack, tape or

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other type of memory); and (a) every copy of each document which is not an exact duplicate of a document which is produced, (b) every copy which has any writing, figure or notation, annotation or the like on it, (c) drafts, (d) attachments to or enclosures with any document and (e) every document referred to in any other document.

16. The terms "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.

17. Words in the masculine shall be construed in the feminine, and vice versa, and words in the singular shall be construed in the plural, and vice versa, where appropriate in the context of a particular question or questions.

18. The terms not defined herein shall have their ordinary meaning, unless such terms are defined in CERCLA, RCRA, 40 C.F.R. Part 300 or 40 C.F.R. Parts 260 - 280, in which case the statutory or regulatory definitions shall apply.

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## Questions

1. Identify the person(s) answering these Questions on behalf of Respondent.

2. For each and every Question contained herein, identify all persons consulted in the preparation of the answer.

3. For each and every Question contained herein, identify all documents consulted, examined, or referred to in the preparation of the answer or that contain information responsive to the Question and provide true and accurate copies of all such documents.

4. Describe in detail Rollins' waste disposal practices from November, 1987 until the present as those practices relate to the United States Department of Energy (DOE) Savannah River Plant (DOE Plant) located in Aiken, South Carolina. Your response should include, but not be limited to the handling, reconditioning, reclamation, recycling or cleaning of any and all drums received by Rollins from the DOE Plant.

5. Provide all documentation in your possession or the possession of your company's affiliates, subsidiaries or other entities which relates in any way to drums A and B (referenced in the cover letter) and/or New Jersey State Manifests NJA 0307185 and NJA 0307192. Your response should include but not be limited to any and all documents relating to the transfer of any drums received from the DOE Plant by Rollins to any and all third parties.

6. Identify all persons, including you, your company's current or former employees, and current or former employees of your company's affiliates, subsidiaries or other entities, who have knowledge, information or documents concerning the handling, reconditioning, reclamation, recycling or cleaning of any and all drums received by Rollins from the DOE Plant.

7. Identify all persons, including you, your company's current or former employees, and current or former employees of your company's affiliates, subsidiaries or other entities, who have knowledge, information or documents concerning the transfer of any drums received from the DOE Plant by Rollins to any and all third parties.

8. Identify the party(ies), if any, which acquired drums A and B from Rollins. If you are unable to identify this/these party(ies), provide the names and addresses of all parties to which Rollins has sold, exchanged, leased and/or given drums brought to Rollins from the DOE Plant from November, 1987 until the present. Indicate the volume and/or number of drums sold, exchanged, leased and/or given annually to each party identified.

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